

Exhibit I

Excerpts from December 12, 2022 deposition of Tatiana Sherman

Plaintiff's job as MEP Coordinator and workforce project manager in 2018 "was to report training activities and programs." (p. 20-21).

Plaintiff's job description as MEP Coordinator was expanded in 2018 and new duties were added to her job description to "maintain proper records, data collection, [and] reporting system." (p. 22).

Plaintiff's job as workforce project manager was to promote workforce services in a 5-county district, annually visiting 86 companies and distributing information about the services provided. (p. 26).

In preparing her 100+ page response on April 4, 2019 to the Performance Improvement Plan (PIP) dated March 8, 2019, Plaintiff acknowledged that the data and information came from quarterly reports and that as MEP Coordinator, she did have a lot of data collection for the entire department for her to see what projects were done and what programs were offered and the amount of money allocated through the reimbursement programs. (pp. 62,110).

Other sources from which Plaintiff collected that data were Pro Assessment and WESS, the Workforce Enhancement Subgrant System, which is the system offered through the Mississippi Community College Board (MCCB), and "that is how they monitor all training activities throughout the community colleges." Plaintiff "reviewed the documents on shared files of data specialist Emily Lawrence to show the information as far as the cost for training, books, [and] training material." (P. 63).

Plaintiff spoke to Dr. Joe Lowder about Southern Motion in February 2016 and "explained to him that we could not change training logs unless Southern Motion used class rolls without start and end time listed on them." (pp. 64-65).

In November 2018 Plaintiff spoke to ICC employees Waters and Spradlin about the ICC Food Pathway program. "There were other conversations that I tried to show that we were not providing services based on our policies because of the way we offer classes to individuals and charge them based on the fact that they can afford to pay for it versus what the cost actually was." (p. 65).

In reporting to the state audit department on matters that she considered to be illegal activities, she did that in order to make sure that information was accurate and complete and provided to a state agency that was in charge. In doing so, "I tried to be as honest as possible." (pp. 65-66).

